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Treuman Katz, Chair
Washington State Board of Health
PO Box 47990
Olympia WA 98504-7990

August 20, 2008

Dear Chairman. Katz:

On behalf of the 81,000 members of the Washington Education Association, I urge the members of the Board to adopt the proposed new school health rules without delay.

The urgent need for updated school health rules has been thoroughly demonstrated by public testimony from parents of students whose health has been damaged by unhealthy school environments. Many school buildings in Washington State pose a health hazard because no one has, for example, walked through them to note and remediate mold growth or water incursion that leads to mold growth. In other schools, student and staff absences spike because no one has checked the ventilation system to ensure that adequate outside air is pulled into the system and that the filters have been changed on schedule.

The construction related requirements of the proposed rules – those few rules that might cause additional costs – do not apply to schools for which a building permit application was filed before September 1, 2010; the standard regarding insulation of air ducts does not apply if a building permit application is filed before September 1, 2013. This allows school districts ample time to design new building plans to meet environmental health standards. Annual environmental health inspections by local health officers are not required until September 1, 2011; this allows local health jurisdictions time to obtain staff training. Initial water testing requirements for lead are not effective until 2010; repeat water monitoring is not required until 2017. The effective dates of copper testing requirements are further postponed. Adopting the rules immediately while setting a delayed effective date for certain provisions also gives districts and local health officers time to acquire any funding needed for compliance. The delayed effective dates strike a good balance between the urgent need to protect student and staff health, and districts' and local health officers' concerns regarding funding, staffing and planning.

Once adopted, the new rules will significantly enhance the safety and health of school buildings, providing much greater protection of student and staff health. WEA remains committed to working with the Legislature to provide the funding necessary to keep students and staff working in a healthy environment. WEA urges that the rules be adopted as soon as the public comment period ends.

Thank you.

Mary Lindquist
President, Washington Education Association